

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SCANSOFT, INC.,

Plaintiff,

v.

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR,

Defendants.

C.A. No. 04-10353-PBS

AFFIDAVIT OF SARAH CHAPIN COLUMBIA

I, Sarah Chapin Columbia, hereby depose on oath and state as follows:

1. On February 25, 2005, counsel for Defendant Voice Signal Technologies, Inc. produced documents to counsel for Plaintiff ScanSoft, Inc., including documents Bates stamped VST 03685- VST 03772. This Bates range included executed copies of Voice Signal's Proprietary Information and Inventions Agreement with the four individual defendant-employees, including that of Laurence Gillick.

2. I have been responsible for retaining and working with Voice Signal's non-testifying expert, Dr. Bill Byrne. Dr. Byrne has been engaged on behalf of Voice Signal since early 2006, primarily to assist Voice Signal in its communications with the Neutral Expert. ScanSoft and its attorneys have been aware at least since March 24, 2006 (the date of our first meeting with the Neutral Expert) that Dr. Byrne had been retained by Voice Signal.

3. A few months later, Dr. Byrne was approached by a representative of ScanSoft. The representative inquired about opportunities for ScanSoft to fund research to be performed

under Dr. Byrne's supervision at Cambridge University. The ScanSoft representative continued to pursue Dr. Byrne and the possibility of funding his research into late 2006.

Signed under the pains and penalties of perjury this 7th day of February, 2007.

/s/ Sarah Chapin Columbia
Sarah Chapin Columbia

CERTIFICATE OF SERVICE

I hereby certify as follows:

1. This document filed through the ECF system will be sent electronically to the registered participants in the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 7, 2007.

2. On February 7, 2007, a true and correct copy of this document and the accompanying pleadings was served by hand to Rebecca L. Hanovice, Esq. of Bromberg & Sunstein LLP, 125 Summer Street, Boston, MA 02111.

/s/ Sarah C. Columbia

Sarah C. Columbia